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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

JOEL SIGALA,	)	Case No.: 1:23-cv-01651-JLT-GSA
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
vs.	)	
MARTIN O'MALLEY,	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended forty-nine (49) days from May 23, 2023, up to and including July 11, 2024. This is the Defendant's first request for an extension.

Defendant requests this extension in order to review the record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel was recently assigned this case along with several other cases, and now has five cases due in the next two weeks. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good

1 faith and with no intention to unduly delay the proceedings, and counsel apologizes for any  
2 inconvenience.

3 The parties further stipulate that the Court's Scheduling Order shall be modified  
4 accordingly.

5 Respectfully submitted,

6 PENA & BROMBERG, PC

7 Dated: May 15, 2024

/s/ Jonathan O. Pena\*

(\*as authorized via e-mail)

8 JONATHAN O. PENA

9 Attorney for Plaintiff

10 Dated: May 15, 2024

PHILLIP A. TALBERT

11 United States Attorney

MATHEW W. PILE

12 Associate General Counsel

13 Social Security Administration

14 By: /s/ Michelle A. Pavelek

MICHELLE A. PAVELEK

15 Special Assistant U.S. Attorney

16 Attorneys for Defendant

17  
18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an  
20 extension, up to and including July 11, 2024 to respond to Plaintiff's Brief and Plaintiff's  
21 optional reply brief will be extended to July 25, 2024.

22 IT IS SO ORDERED.

23  
24 Dated: May 16, 2024

/s/ Gary S. Austin

25 UNITED STATES MAGISTRATE JUDGE